



RICHARDS | WATSON | GERSHON

ATTORNEYS AT LAW – A PROFESSIONAL CORPORATION

355 South Grand Avenue, 40th Floor, Los Angeles, California 90071-3101
Telephone 213.626.8484 Facsimile 213.626.0078

**SFUND RECORDS CTR
2242027**

RICHARD RICHARDS
(916-1988)

GLENN R. WATSON
(RETIRED)

HARRY L. GERSHON
(1922-2007)

STEVEN L. DORSEY
WILLIAM L. STRAUSS
MITCHELL E. ABBOTT
GREGORY W. STEPANICH
ROCHELLE BROWNE
QUINN M. BARROW
CAROL W. LYNCH
GREGORY M. KUNERT
THOMAS M. JIMBO
ROBERT C. CECCON
STEVEN H. KAUFMANN
KEVIN G. ENNIS
ROBIN D. HARRIS
MICHAEL ESTRADA
LAURENCE S. WIENER
STEVEN R. ORR
B. TILDEN KIM
SASKIA T. ASAMURA
KAYSER O. SUME
PETER M. THORSON
JAMES L. MARKMAN
CRAIG A. STEELE
T. PETER PIERCE
TERENCE R. BOGA
LISA BOND
JANET E. COLESON
ROXANNE M. DIAZ
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ROY A. CLARKE
WILLIAM P. CURLEY III
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REGINA N. DANNER
PAULA GUTIERREZ BAEZA
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NORMAN A. DUPONT
DAVID M. SNOW
LOLLY A. ENRIQUEZ
KIRSTEN R. BOWMAN
BILLY D. DUNSMORE
AMY GREYSON
DEBORAH R. HAKMAN
D. CRAIG FOX
SUSAN E. RUSNAK
G. INDER KHALSA
GINETTA L. GIOVINCO
TRISHA ORTIZ
CANDICE K. LEE
DAVID G. ALDERSON
MELISSA M. CROSTHWAITE
MARICELA E. MARROQUIN
GENA M. STINNETT
JENNIFER PETRUSIS
STEVEN L. FLOWER
CHRISTOPHER J. DIAZ
DEBBIE Y. CHO
ERIN L. POWERS
TOUSSAINT S. BAILEY
WHITNEY G. McDONALD
SERITA R. YOUNG
VERONICA S. GUNDERSON
SHIRI KLIMA
DIANA H. VARAT
KATRINA C. GONZALES
CHRISTOPHER L. HENDRICKS

OF COUNSEL
MARK L. LAMKEN
SAYRE WEAVER
JIM R. KARPIAK
TERESA HO-URANO

SAN FRANCISCO OFFICE
TELEPHONE 415.421.8484

ORANGE COUNTY OFFICE
TELEPHONE 714.990.0901

May 12, 2010

VIA OVERNIGHT DELIVERY

Ms. Kim Muratore,
Case Developer (SFD-7-5)
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Request for Information: North Hollywood Operable Unit

Dear Ms. Muratore:

On behalf of the Burbank-Glendale-Pasadena Airport Authority ("Authority"), this will respond to EPA's supplemental request for information pursuant to CERCLA Section 104(e) dated March 24, 2010 and directed to Mr. Dan Feger. The Authority has limited its response to that portion of the Bob Hope Airport that is located within the North Hollywood Operable Unit as defined by EPA's Map A attached to the March 24, 2010 supplemental request.

As requested in EPA's March 24, 2010 letter and its prior December 11, 2007 letter requesting information pursuant to Section 104(e), the Authority identifies the undersigned as the contact person to whom EPA should direct future correspondence in regard to the March 24, 2010 information request. Any such correspondence should also be copied to Mr. Dan Feger, Executive Director, Burbank-Glendale-Pasadena Airport Authority, 2627 No. Hollywood Way, Burbank, California 91505.

EPA's instructions for responding to its requests for information asked that the Authority identify all the persons that the Authority relied upon in answering the specific request. The Authority hereby identifies Mr. Mark Hardymont and Mr. Dan Feger, whose names, positions, and years of employment at the Authority were previously identified in the Authority's February 29, 2008 responses, Exhibit "A". Messrs. Feger and Hardymont provided information relevant to all questions. In addition, the Authority identifies Mr. Leo Klabbers, currently an independent consultant to the Authority, and previously an engineer with the Authority, with respect to its responses to EPA's supplemental questions nos. 7 and 17. The Authority identifies Mr. Chuck Godwin, currently an employee of the airport Fire Department and previously an employee of the Lockheed Fire Department (believed

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to be a part of Lockheed-California, a division of Lockheed Corporation), as providing assistance in answering EPA supplemental question no. 5.

Please feel free to call me at my direct dial number (213) 253-0235 or by e-mail (ndupont@rwglaw.com) if you have any further questions regarding the Authority's responses.

Very truly yours,



Norman A. Dupont

Enclosure (CD Disc with documents Nos. 1-36)

cc: Mr. Dan Feger (w/encls.)
Michael Massey, Esq. (w/encls.)

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RESPONSES TO EPA SUPPLEMENTAL REQUESTS FOR
INFORMATION PURSUANT TO CERCLA SECTION 104(E)

1. Request No. 7 of the December 11, 2007 Request for Information states, "Provide the dates that the BGPAA has itself conducted operations at the Facility." The BGPAA responded to this question generally by stating that BGPAA "conducted (and continues to conduct) normal business operations associated with its joint powers authority activities from 1978 to the present time." Describe the nature of "normal business operations" conducted by the BGPAA since 1978 at the Facility. Please be specific as possible, describing in detail the types of activities conducted, the buildings or other locations where such operations took place, and the dates of those operations.

BGPAA Response to Supplemental Question No. 1:

The Burbank-Glendale-Pasadena Airport Authority ("Authority") is set up as a California joint powers authority to administer the operations of the Bob Hope Airport. This administrative function includes accounting for receipts and costs in running a major public airport, projecting future needs for facility development, maintenance, and traffic management, interfacing with FAA and other regulatory agencies having jurisdiction over airport operations, interfacing with various other public agencies including the cities of Burbank, Glendale, Los Angeles, and Pasadena, providing airport security and fire services, ensuring compliance with environmental laws and conditions including noise restrictions for aircraft, and negotiating leases and contracts with airlines, food, beverage, rental car, and other service tenants located on the airport property, and ensuring perimeter security for the Airport. The Authority's principal administrative officers are located in the

main airport terminal building, but the Authority also has various locations for ancillary functions and services throughout the Bob Hope Airport. Many of the activities of the Authority, except for the police department, were and are performed by outside contractors, including Protec for fire protection, TBI (currently) for management, Central Parking for parking operations, and various vendors for other services, such as janitorial. From 1978, when the Authority acquired the Airport, until approximately 1995, all of the airport services (except the police function) were provided by Lockheed Air Terminal, Inc., a wholly owned subsidiary of Lockheed. A map of the current boundary of the Airport is attached to these Responses. [CD, Doc. No. 1.]

2. EPA has reviewed copies of the February 1987 Investigation of Underground Storage Tanks and the May 1988 Investigation and Closure of Underground Storage Tanks reports, but these reports do not clearly identify all of the underground storage tanks ("USTs") which were owned by the BGPAA. Please provide a map showing the location of all BGPAA-owned USTs, both active and inactive, at the Facility. Identify the dates these BGPAA-owned USTs were active and describe their contents.

BGPAA Response to Supplemental Question No. 2:

A review of the A. L. Burke report dated May 1998 indicates that the purpose of the report was to investigate all underground tanks on Airport property and specifically that: "All tanks, active or abandoned, Authority or Tenant-owned, were included in this work. In addition, the potential for contamination from crash and rescue operations in the firepit area were also evaluated." (AL Burke May 1998 report at p. 1, "Abstract."). Thus, the Authority does not understand EPA's position that the prior AL Burke reports do not "clearly

identify" all of the underground storage tanks "which were owned by the BGPAA."

To the extent, however, that EPA is requesting confirmation of the location of tanks described in the May 1998 AL Burke report as in use by the BGPAA, then the Authority responds that the following tank was in use (or operated by) the Authority at that time within the boundary of the North Hollywood Operable Unit (as described in EPA's March 24, 2010 letter to the Authority):

** 1,000 gallon rated capacity diesel fuel tank for an emergency power generator required by the Federal Aviation Administration and located on the north side of former Lockheed Building No. 33 east of the north/south runway. The documents submitted as part of the Authority's February 29, 2008 response to a prior EPA request for information pursuant to CERCLA Section 104(e) in **Exhibit E** show that this diesel tank and its piping was subject to a continuous monitoring system provided by Veeder-Root. **CD, Doc. No. 2** contains a copy of the emptying of liquids and removal certification for this underground storage tank in 2009. That underground tank has not been replaced by the Authority since a new configuration of the emergency generator did not require an underground tank.*

3. Real property records obtained by EPA indicate that the BGPAA acquired the property which formerly comprised Lockheed's Plant C-1 in 1998. Please state whether the BGPAA itself has conducted any activities or operations in the **former Plant C-1 area** since it acquired this property. If so, please describe the time period(s) and nature of these activities or operations. If not, describe the time period(s) and nature of the activities or operations conducted by the BGPAA's tenants in the area. Please also provide a copy of the October 17, 1994

soil investigation report for the former Plant C-1 area that is referred to in the December 7, 1994 No Further Action letter sent to the BGPAA by the Los Angeles Regional Water Quality Control Board ("RWQCB").

BGPAA Response to Supplemental Question No. 3:

(a) The Authority leased a portion of property immediately to the South of the Lockheed C-1 plant to Lockheed (then Lockheed Properties, Inc.) in a lease dated 1980 and with an amended lease dated 1986. [CD, Document No. 3]. Thereafter, the Authority conducted environmental investigations of both the former C-1 property itself [CD, Documents Nos. 4-6] and the area immediately south of the C-1 facility that was leased to Lockheed in the 1980s. [CD, Documents Nos. 7-8]. Based upon both the RWQCB's letter of December 7, 1994 [CD, Doc. No. 6] and its own independent consultant's (Fugro/West, later ENSR) review of July 19, 1995, it appears that the "contaminated areas [including VOCs] identified by previous site investigations have been remediated to the extent possible." [CD, Doc. No. 6]. The Authority has searched the records of its former consultant, ENSR, and its own records, but to date has been unable to locate a copy of the October 17, 1994 soil investigation report for the former C-1 area that was referenced by EPA in its supplemental question no. 3. Indeed, the Authority's review of the source referencing an October 17, 1994 soil report, the December 7, 1994 Regional Board letter does not disclose any such reference. The Authority's review of the Regional Board's December 7, 1994 letter indicates references to various soils reports submitted to the Regional Board by Lockheed dated in October 1993, but not to any October 17, 1994 soils report. Nonetheless, the Authority will continue to investigate other possible sources of this document and will provide EPA with an update concerning any copies of the October 17, 1994 soil investigation report should the

Authority subsequently locate a copy of that report. The Authority is also submitting to EPA an August 21, 1992 report by Lockheed's consultant, URS Consultants, Inc., that confirms the results of split soil sampling conducted in 1992 by Lockheed of soils tested by the Airport's consultant, A.L. Burke at the C-1 plant. As documented by Lockheed's consultant, all soil samples collected from two piles of "clean soils" as a result of environmental work at the C-1 plant tested as non-detect for petroleum hydrocarbons. [CD, Doc. No. 9].

(b) Subsequent (post-acquisition) operations by Authority tenants at the former Lockheed C-1 facility:

After Lockheed abandoned the leasehold portion (immediately south of the principal C-1 plant), and after the Authority obtained possession of the condemned portion of C-1, the Authority made the site (approximately 15.4 acres) available to Mercury Air Group, Inc. (now Atlantic Aviation, a division or subsidiary of Macquarie Infrastructure Company, Inc.) for general aviation ramp and hangar development, and also made a portion of the C-1 property available to FAA for a radio transmitter and receiver facility. The Airport Authority respectfully submits that details of Mercury Air Group's activities or the FAA's activities on the parcel in question is best answered by that industry or agency directly.

4. Information obtained by EPA indicates that two fire pits commonly referred to as the **Bunker Simulated Gasoline fire pit** and the **Civil Air Patrol fire pit** were formerly located near the western end of the Facility and south of the east-west Runway 8-26. For each fire pit:

- a. Provide the dates the pit was in operation and the time periods during which training exercises were conducted;

- b. Provide the name/s of the parties who conducted training exercises and any other activities at the pit, and describe the relationship between the BGPAA and each operator (specifically stating whether the BGPAA itself conducted activities here);
- c. Describe the training exercises and any other activities conducted at the pit;
- d. List the substances utilized and combusted in the training exercises;
- e. Describe any remediation efforts that have been conducted at or near the pit location (or former location); and
- f. Provide copies of all documents that further evidence the nature and scope of fire pit operations, to the extent that such documents have not been previously submitted to the EPA and by the BGPAA.

BGPAA Response to Supplemental Question No. 4:

*(a)-(d) BGPAA believes that the location of the **Bunker Simulated Fire Pit** and the **Civil Air Patrol fire pit** is closest to the leased property originally known as **Flight East, Inc.** [CD, Document No. 10]. Based upon documents available to it, BGPAA further believes that **Flight East, Inc.** was the original tenant on this property after the Authority acquired it from Lockheed in 1978. A lease between the Authority and **Flight East** in 1979 indicates that **Flight East** leveled, graded, and asphalt paved the land in question as part of its initial leasehold improvements at its expense in 1978. [CD, Doc. No. 11]. Indeed, a 1990 soil boring of a boring in the former **Civil Air Patrol fire pit** area by*

*A.L. Burke engineers shows that the initial surface description for that boring was described as 3-4 inches of asphalt. [CD, Doc. No. 12]. Based upon this understanding, the Authority believes that it never utilized either the former **Bunker Simulation Fire Pit** or the **Civil Air Patrol fire pit** for any activity, and that, to the contrary, the land in question was paved over with asphalt by at least 1979 and thereafter utilized by a tenant (Flight East) for its operations of a flight hangar and aircraft storage facility.*

(e)-(f): The Authority does have in its files copies of documents dated July 1991, August 1991, October 1991 and September 29, 1992 which describe both the nature of activities at both former fire pits prior to the Authority's ownership of the land and various remedial soil and soil vapor investigations undertaken by the Authority subsequent to the acquisition to ensure that no potential contamination from either former fire pit posed a threat or potential threat of contaminant migration to groundwater. The Authority is supplying EPA with copies of those documents pursuant to this request. [CD, Doc. Nos. 10, 13-15].

In addition, the Authority has previously supplied EPA in its February 29, 2008 response a copy of the Fugro West, Inc. January 1996 report which describes a supplemental soil vapor survey of six different areas, including the former Civil Air Patrol Fire Training Pit and the former Bunker Simulated Gasoline Fire Training Pit. With respect to the Civil Air Patrol Fire Training Pit area, the soil vapor survey demonstrated that no VOCs other than carbon tetrachloride at very low levels (less than 5 ug/L) were detected, and that a further test at a depth of 15 feet below ground surface for one soil vapor probe (SV-35) showed a complete set of "non-detects" at detection limits at that depth. As to the Bunker Simulated Gasoline Fire Training Pit, the January 1996 Fugro West, Inc. report

demonstrated very low levels of TCE and PCE (below 5 ug/L) at a depth of 5 feet below ground surface. Based upon this data, Fugro West, Inc. recommended that "no further action" be taken with respect to these locations. (BGPAA 0128-0130 (submitted to EPA as part of Feb. 29, 2008 responses to request for information). The Regional Water Quality Control Board for the Los Angeles Region accepted Fugro West, Inc.'s recommendation in a letter dated April 5, 1996. [CD, Doc. No. 22].

5. Please state whether the BGPAA or any of its tenants have conducted fire training exercises at any **other fire pit location** at the Facility. If so, please provide a map showing the locations of all other fire pit areas and respond to the questions in Request No. 4 above with regard to each fire pit.

BGPAA Response to Supplemental Question No. 5:

The Airport Authority is only aware of a "fire pit" as described in a May 1988 report from its then consultant, A.L. Burke. [CD, Doc. No. 16]. That report describes a "fire pit" located to the "north of the north-south runway" that was "periodically" used for fire fighting (crash and rescue) practice. Interviews with Airport employees indicate that the fire pit was quite shallow in depth (12-18" below ground surface), and that fire-fighting techniques (i.e., principally reliance upon water to douse the initial ignition fire) at that time would have typically allowed almost complete burning of any compound placed in the pit. Commencing in 1978, the Airport Authority also contracted all of its fire-fighting functions (including crash-fire-rescue services) at the Bob Hope Airport to Lockheed's fire protection service, a part of Lockheed-California Company, which was in turn a division of Lockheed Corporation. The A.L. Burke May 1988 report further indicates that an investigation of the "fire

pit” (crash and rescue operations) was conducted and that based upon the results of that investigation, “no curtailment of operations or remedial structures were recommended.” [CD, Doc. No. 16 at ENSR 004229]. In addition, an attached report documented very low levels of petroleum hydrocarbons (less than 20 mg/kg) were detected in the soils identified as “runway” in the chain of custody documents. [CD, Doc. No. 16 at ENSR 004232]. The A. L. Burke report also indicated that very low levels (below 1 mg/kg) were detected in three soil samples at the “fire pit”, but concluded that given the fact that these results were very close to the detection limit, “the samples do not show much evidence of leakage.” [CD, Doc. No. 16 at ENSR 004232].

The Airport Authority believes that usage of the “fire pit” north of the north/south runway ceased in the 1988-1989 time period, i.e., approximately at the same time as the A.L. Burke report in May 1988.

6. A 1990 Site Characterization Phase I Soil Sampling Report states that solvents may have formerly been used to clean equipment in the **Pit 60 Wash Rack**, which was located south of the east-west Runway 8-26 and adjacent to the Mercury Inc. facilities. The report notes that portions of the wash rack and associated clarifiers/sumps were still in operation in 1990. With regard to the Pit 60 Wash Rack, please identify:

- a. The dates that operations were conducted in this area;
- b. The name/s of all operators who conducted operations in this area (specifically stating whether the BGPAA itself conducted operations here);

- c. The nature of the operations conducted;
- d. The solvents and other hazardous substances used and stored in this area;
- e. The hazardous wastes generated by these operations; and
- f. Provide copies of all documents that further evidence the nature and scope of operations that occurred at the Pit 60 Wash Rack, to the extent that such documents have not been previously submitted to the EPA by the BGPAA.

BGPAA Response to Supplemental Question No. 6:

The Airport Authority's principal source of information for responding to this question is the A.L. Burke report, "Site Characterization Phase I: Soil Sampling" dated June 1990. [CD, Doc. No. 17.] A review of the A.L. Burke report dated June 1990 reveals that no soil borings made down to a depth of 65 feet around the Pit 60 Wash Rack area demonstrated any detectable levels of VOCs. [CD, Doc. No. 17, ENSR NO. 025380; id at ENSR 0253389]. Based upon this information, there appears to be no possible VOC contamination caused by the Airport Authority or any of its tenants up to the time of the June 1990 A. L. Burke report.

(a) –(c): The Authority believes that the only operations (conducted by its then tenant, Mercury, Inc. in this area are fully described in the A.L. Burke report from June 1990, at ENSR 025378. In 1997, the Airport Authority executed a new "developmental ground lease" with Mercury Air Group [CD, Doc. No. 19], which fundamentally changed the nature of any

prior operations due to improvements carried out by Mercury Air Group as part of the “developmental ground lease.”

*(d)-(e): Based upon the June 1990 report by A.L. Burke, the Authority does not believe that any solvents or hazardous substances were in fact ever used at the **Pit 60 Wash Rack** area.*

(f) See CD, Doc. Nos. 17, 19.

7. In a November 30, 1990 letter from the RWQCB to the BGPAA commenting on the 1990 Site Characterization Phase I Soil Sampling Report, the Board requests that additional soil sampling be conducted in the **Pit 60 Wash Rack** area. Provide complete copies of all reports which document additional soil sampling conducted at the Pit 60 Wash Rack by the BGPAA. If no additional sampling was conducted in this area by the BGPAA, explain why the requested soil sampling was not conducted.

BGPAA Response to Supplemental Question No. 7:

*The Airport Authority has made diligent efforts to locate either the referenced RWQCB letter of November 30, 1990 or any response thereto. To date, the Authority has been unable to locate these documents, which date back at least 20 years. Nonetheless, the Airport Authority has interviewed a long-term employee (Mr. Leo Klabbers) who has provided the following general information based upon his memory of former operations in this area. The **Pit 60 Wash Rack** area was modified and then utilized by an airline then known as PSA (Pacific Southwest Airlines) to wash its aircraft. Mr. Klabbers understood that PSA’s wash rinsate was discharged to the sanitary sewer line via a connection close to the wash rack area. The Authority does not know the nature or constituents of*

the wash solution that was utilized by PSA at that time. In 1987, PSA was acquired by U.S. Air. The Authority believes that the “wash rack” area would have ceased being operated by any tenant sometime after that acquisition. The Airport Authority believes that the A. L. Burke report in June 1990 adequately documented that soil borings to a depth of 65 feet below ground surface found no VOCs at any detectable limit. [CD, Doc. No. 17] Therefore, there was no need for any further soil sampling to determine whether VOCs were used or released at the former Pit 60 Wash Rack area. [CD, Doc. No. 18, ENSR 07143.] The California Regional Water Quality Control Board instructed Lockheed to complete certain investigations, including one further soil boring adjacent to the clarified located in the southeast of the wash rack and a “sufficient number of samples in the wash rack area and drain collection sump” to evaluate those areas in a letter dated August 29, 1997. While the Authority does not have a copy of Lockheed’s response to the Water Board’s instruction of August 29, 1997, the Authority assumes that Lockheed complied with this instruction as part of its overall investigation in the former B-5 plant. In 2004 the Regional Water Quality Control Board issued a “no further action” letter to Lockheed with respect to the soils in and around the former B-5 plant, which would have included the former wash pit area. [CD, Doc. No. 36].

8. In relation to the **Borate Loading Area** located near the south end of the north-south Runway 15-33, please identify:

- a. The dates that operations were conducted in this area;
- b. The name/s of all operators who conducted operations (specifically stating whether the BGPAA itself conducted operations here);

- c. The nature of the operations conducted;
- d. The hazardous substances used and stored;
- e. The hazardous wastes generated by these operations; and
- f. Provide copies of all documents that further evidence the nature and scope of operations that occurred in the Borate Loading Area, to the extent that such documents have not been previously submitted to the EPA by the BGPAA.

BGPAA Response to Supplemental Question No. 8:

(a)-(e): As of 1990, the Airport Authority's then consultant, A.L. Burke, reported that the "above-ground borate loading area" was "formerly utilized as a loading site for the fire retardant borate." [CD, Doc. No. 17, ENSER 025378]. Based upon this description, and its own investigation, the Authority concludes that the borate storage area was no longer active as of June 1990. The Authority lacks sufficient documentation or employee recollection to confirm the exact date that the borate storage area was no longer utilized for that function. As described in CD, Doc. No. 17, the borate loading area was utilized as a "loading site" for the fire retardant borate. The material was further described as a "sodium-calcium-borate with bentonite clay" mixture, with a further description that "ammonium compounds" were also utilized. [CD, Doc. No. 17, ENSER 025378]. As further documented in the A.L. Burke 1990 report, an investigation of four separate soil borings to a depth of 65 feet each revealed that this area was "free from VOC contaminants." [CD, Doc. No. 17, ENSER 025387]. A.L. Burke also concluded that as to metals and nitrate and ammonia

nitrogen, all levels were within “normal natural concentrations.” Thus, based upon the examination concluded in 1990, the Airport Authority concludes that no VOCs or other “chemicals of concern” identified by EPA in the North Hollywood Operable Unit were used, stored, or released in the borate loading area. (f) See CD, Doc. No. 17.

9. In relation to the current **Airport Maintenance Yard** located at 7901 San Fernando Road, please identify:

- a. The dates during which the BGPAA conducted operations in this area;
- b. The nature of operations conducted by the BGPAA;
- c. The hazardous substances used and stored by the BGPAA;
- d. The hazardous wastes generated by the BGPAA's operations; and
- e. The contents of the three above ground storage tanks (“ASTs”) formerly located in the northwestern corner of the yard.

BGPAA Response to Supplemental Question No. 9:

*(a) The Authority estimates that it commenced operations at the current **Airport Maintenance Yard** in approximately 1985 and has operated the yard continuously since that time.*

(b) The Airport Maintenance Department uses this area for multiple purposes, including: (1) provide parking for department management and staff; (2) house the Department's fleet of utility trucks, motorized special equipment (such as forklifts to

high lift trucks to airfield sweepers); (3) store equipment such as table and radial arm saws, welding equipment, and paint. The **Airport Maintenance Yard** is also utilized to store an inventory of spare parts and supplies. The **Airport Maintenance Yard** also contains an above-ground 12,000 gallon capacity diesel fuel tank with associated dispensing pump. The approximate location of the 12,000 gallon capacity above-ground tank is depicted in documents provided to EPA by the Authority in February 29, 2008, **Exhibit E**. This tank is owned by Southwest Airlines and operated on the airline's behalf by Aircraft Service International Group, as was noted in **Exhibit E** to the Authority's responses dated February 29, 2008. The **Airport Maintenance Yard** also provides space for the Airport's contractor for vehicle maintenance, LSF Shuttle, to conduct minor repairs such as oil change, tire change, and repairs to the coach/cabin portion of vehicles. The **Airport Maintenance Yard** is also an area where the Airport's contractor, Royal Mobile, washes vehicles. Used rinse water from the vehicle-washing process is discharged to a sanitary sewer connection after filtration through an in-line oil/water separator. The **Airport Maintenance Yard** also contains a fenced area where 55-gallon drums of various industrial compounds, including waste materials, are temporarily stored until removal by a licensed waste hauler, currently Patriot Environmental Services.

(c) To the best of BGPAA's knowledge, the motor pool/maintenance office located at 7901 San Fernando Road did not utilize any VOCs or other chemicals of concern identified by EPA with respect to the North Hollywood Operable Unit.

(d) The Airport Authority objects to having to list "hazardous wastes" (such as waste oil under the California waste statute) that do not contain chemicals of concern previously identified by EPA in connection with the North Hollywood Operable Unit.

To the best of the Airport's knowledge, the motor pool/maintenance operation did not generate any hazardous waste that contained either wholly or in part any "chemical of concern" identified in the North Hollywood Operable Unit.

*(e) The Airport Authority is only aware of the fact that the "three above ground storage tanks" in this area were removed and that only the "concrete base/foundation" for such tanks remained as of June 1990 as documented in **CD, Doc. No. 17, ENSR 025379**. The Authority is not currently aware of when these above-ground tanks were removed and is not aware of any study or survey of the tanks at the time of removal that would demonstrate the former contents of the former tanks. But, the Authority notes that A.L. Burke supervised the design and drilling of at least three soil borings in the area of the former **American Drug and Chemical Co.** site upon which the three tanks were located. As reported by A.L. Burke in June 1990, the three soil borings (down to a depth of 65 feet below ground surface) were analyzed for VOCs and semi-volatile VOCs with results that were non-detect at the detection limits. In addition, the Airport Authority is providing EPA with a copy of the October 1991 A. L. Burke report on certain confirmatory soil borings and a soil gas survey for four areas, including the former **American Drug and Chemical Co.** site. [CD, Doc. No. 17]. This A.L. Burke October 1991 report concluded that the relatively low levels of VOCs found in the soil gas (but not the confirmatory soil borings) beneath the former **American Drug and Chemical Co.** site (including soil gas investigations in and around the former location of the above-ground tanks at that site) merited no further investigation.*

*In addition, as previously supplied to EPA in the Authority's February 29, 2008 response to EPA's request for information, file D-4 to **Exhibit F**, a Fugro West, Inc. Supplemental Soil Vapor Survey was completed in January 1996. That survey*

included two soil vapor samples at depths of 5 feet below ground surface on either side of the former above-ground storage tank area (SV-9 and SV-10). As demonstrated in Table 2 to the January 1996 Fugro report (CD, Doc. No. 21), both soil vapor samples on either side of the former above-ground tanks resulted in "non-detect" for all VOCs tested. Thus, the only evidence currently available to the Authority demonstrates that the three above-ground storage tanks likely did not contain or store VOC compounds. In its conclusion, Fugro West recommended that "no further action" be taken with respect to the former American Drug and Chemical site (including the former above-ground tank area), and the Regional Water Quality Control Board agreed with this recommendation in its letter dated April 5, 1996. [CD, Doc. No. 22, ENSR 002113].

10. Information obtained by EPA indicates that the area currently known as the **Airport Maintenance Yard** located at 7901 San Fernando Road was formerly operated by American Drug and Chemical Co. for an unknown period of time. To the best of your knowledge, please identify:

- a. The dates during which the American Drug and Chemical Co. formerly conducted operations in this area;
- b. The nature of American Drug and Chemical Co.'s operations;
- c. The hazardous substances used and stored by American Drug and Chemical Co.;
- d. The hazardous wastes generated by its operations; and

- e. Provide copies of any documents in your possession that further evidence the nature and scope of operations conducted by American Drug and Chemical Co. in this area, to the extent that such documents have not been previously submitted to the EPA by the BGPAA.

BGPAA Response to Supplemental Question No. 10:

(a)–(d): The Authority does not know what dates the American Drug and Chemical Company formerly operated on this site. The Authority is aware of the 1990 report by A.L. Burke which indicates that Burke’s review of “old photographs” show the presence of three vertical storage tanks during the years 1937, 1941, and 1953 (CD, Doc. No. 17, ENSR 025379), but cannot independently confirm this observation and does not know if American Drug and Chemical Company always operated with the three vertical storage tanks. The Authority is without further information about the exact operations of American Drug and Chemical Company other than the brief summary in A.L. Burke’s June 1990 report about interviews at that time suggesting that American Drug and Chemical Company utilized a “variety” of toxic and flammable materials. Thus, the Authority lacks sufficient information to respond to EPA’s subparts (c)–(d) in this supplemental request for information.

(e) See CD, Doc. Nos. 14, 17, and 21. The latter document [CD, Doc. No. 21] was previously provided to EPA in the Authority’s February 29, 2008 responses.

11. In relation to the **Former Paint Storage and Use area** located at the northern end of the north–south Runway 15–33, please identify:

- a. The dates that operations were conducted in this area;

- b. The name/s of all parties who conducted operations (specifically stating whether the BGPAA itself conducted operations here);
- c. The nature of these operations;
- d. The hazardous substances used and stored;
- e. The hazardous wastes generated by operations; and
- f. As indicated by the 11/30/1990 letter from the RWQCB to the BGPAA, all spills and releases of hazardous substances that have occurred in this area, and provide copies of all documents evidencing such spills and releases.

BGPAA Response to Supplemental Question No. 11:

*(a)-(e) The Authority's best source of information about the **Former Paint Storage and Use Area** is contained in the June 1990 report by the Authority's consultant, A.L. Burke, [CD, Doc. No. 17.] That report states that as of 1990 this site was no longer used. To the best of the Authority's information, this site was never utilized as a former paint shop or site since at least 1978, when the Authority acquired title over the north-south runway (and other areas) from Lockheed. The June 1990 report showed that soil samples at the former paint shop location showed no detections of VOCs above the detection limit. In addition, the August 1991 soil vapor survey conducted at the former paint shop by Target Environmental Services, Inc. showed that even the highest level for a VOC at the former paint shop (PCE) was less than MCLs at a depth of 90 feet below ground surface. [CD, Doc. No. 13, ENSR 003279]. Based upon these soil gas vapor studies, A.L. Burke recommended in*

October 1991 that “no further investigation” be taken in this area. [CD, Doc. No. 14, BGPAA 024469]. Finally, the January 1996 Supplemental Soil Gas Survey by Fugro West, Inc. showed no detections in the former paint shop area. [CD, Doc. No. 21] (previously supplied to EPA in February 29, 2008 responses).

(f) See CD, Doc. Nos. 13 and 21.

12. EPA previously obtained copies of the November 1991 Soil Gas Survey and an August 1993 Phase II Site Assessment/Remediation Report for the **former Maintenance Yard** located at 4750 Wheatland Avenue. The 1993 Phase II report states that several USTs had previously been removed from the northwest area of the yard. Please identify.

- a. The dates that operations were conducted in the yard;
- b. The name/s of all operators who conducted operations (specifically stating whether the BGPAA conducted operations here);
- c. The nature of the operations conducted;
- d. The hazardous substances used and stored in this area;
- e. The hazardous wastes generated from operations;
- f. The contents of the USTs formerly located in the northwestern area of the yard; and
- g. All other soil sampling conducted in this area and provide copies of all sampling and remediation reports, to

the extent that such documents have not been previously submitted to the EPA by the BGPAA.

BGPAA Response to Supplemental Question No. 12:

(a)-(c): *The Authority is currently unaware of all possible operations at the **former Maintenance Yard**, but notes that the building numbering system (502 and 505) suggests that Lockheed Martin Corporation utilized this area at least at one point in time prior to the Airport's assumption of ownership.*

(d)-(f): *The Authority does not know the exact contents of the former underground storage tanks which were (to the best of its current knowledge) located in the northwestern quadrant of the **former Maintenance Yard**. But, the Authority notes that the November 21, 1991 Target Environmental soil gas survey (referenced by EPA in this question) documented undetectable levels of hydrocarbons (non-detect in samples 19 and 20 in the 1991 survey). The Authority further notes that the November 21, 1991 Target Environmental soil gas survey documented levels of VOCs (particularly PCE) of less than 1 ug/L at soil vapor sampling locations 18, 19, 20, and 21. [CD, Doc. No. 23] Thus, based upon the evidence available to it, there appears to have been no release from any of the former underground storage tanks of hydrocarbons and at best a very low (below MCLs) release of VOC compounds in the northwestern quadrant of the **former Maintenance Yard**.*

(g) *The only soil sampling/remediation reports related to the **former Maintenance Yard** that the Authority is aware of are the two reports previously provided to EPA, the November 1991 Target Environmental Services, Inc. November 21, 1990 soil gas survey and the August 1993 Fugro/McClelland Phase II Site Assessment/Remediation Report. The Authority is also aware that the Los Angeles Regional Water Quality Control Board*

conducted an on-site visit in the spring of 1995 and based upon that visit and the prior reports that the RWQCB issued a "no further action" letter on July 28, 1995 to the Authority. A copy of that letter is CD, Doc. No. 24.

13. EPA obtained a copy of the May 25, 1994 Limited Phase II Site Assessment prepared at the BGPAA's request for that portion of the Facility located at **7604 Wheatland Avenue**. This report shows that shallow soil sampling in this area has detected concentrations of total chromium. With regard to the 7604 Wheatland Avenue property, please identify:

- a. The dates that operations were conducted.
- b. The name/s of all operators who conducted operations (specifically stating whether the BGPAA itself conducted operations here);
- c. The nature of the operations conducted;
- d. The hazardous substances used and stored at this property, particularly any containing chromium or hexavalent chromium as a component;
- e. The hazardous wastes generated from operations;
- f. Whether there has been any spills or releases of hazardous substances from this property; and
- g. Provide a copy of the Limited Phase I Environmental Assessment for 7604 Wheatland Avenue, Sun Valley, California, and copies of all other reports which discuss sampling and remediation at this portion of the Facility to the extent that such documents have not been previously submitted to the EPA by the BGPAA.

BGPAA Response to Supplemental Question No. 13:

(a)-(f): *The Authority is unaware of what, if any, operations were formerly conducted at the **7604 Wheatland Avenue** location. The Authority is only aware of information previously provided to EPA that indicates that: (a) a septic tank was located on this property and was removed long ago; and (b) that testing conducted by the Authority's then consultant, Fugro-West, confirmed that there were no levels of hydrocarbons of concern. [Feb. 29, 2008 responses to EPA, Ex. F, part D-2]. The Authority's consultant did not test for hexavalent-chromium at this location, and therefore, the Authority is unable to respond as to whether (or not) any hexavalent chromium was used, stored, or disposed of at this location by a former owner or operator. The Authority notes that in Fugro West in its 1994 report determined that the levels of total chromium were well below any risk threshold and did not pose a significant risk to the environment.*

(g) *The Authority has obtained copies of all files previously maintained on its behalf by ENSR, previously Fugro-West and also reviewed its own files. The Authority has reviewed those files and been unable to locate the Limited Phase I Assessment Report. If the Authority subsequently discovers said Report, then it will forward that report to EPA.*

14. In the November 30, 1990 letter from the RWQCB to the BGPAA, the Board requested that the BGPAA submit a plan characterizing the previous landfill operations at a former **gravel pit area** located along Clybourn Avenue. The letter stated that the plan must also describe the types of waste

materials received by the landfill and the materials used to backfill the area, and that borings must eventually be sited vertically above the former gravel pit area.

- a. Provide a map showing the boundaries of this former gravel out and state whether any portion of the BGPAA-owned property is underlain by the gravel pit;
- b. Identify the dates that the gravel pit was used for landfill operations and the landfill operator(s); and
- c. Provide a copy of the characterization report and all subsurface sampling results. If no characterization or sampling of the gravel pit area was conducted by the BGPAA, explain why the requested investigations were not conducted.

BGPAA Response to Supplemental Question No. 14:

(a)-(b): The Authority is only aware of a generalized location of the former gravel pit that is located "along Clybourne Avenue" and was described in the A.L. Burke June 1990 report[CD, Doc. No. 17] as being owned by the City of Burbank. Based upon the same June 1990 report, the Authority believes that the gravel pit may have been in existence from 1937 through at least 1954. The Authority does not have any further information about the exact dates of operation of the gravel pit. The Authority also is in receipt of the FAA's Final EIS (September 1995). Re: Land Acquisition and Replacement Terminal Project that references RWQCB interviews concluding that Lockheed had formerly utilized the gravel pit area as a "liquid waste disposal site."

(c) As stated in the June 1990 A.L. Burke report (CD, Doc. No. 17), two soil borings were drilled on the perimeter of what was believed to be the former gravel pit. Those soil borings were analyzed and resulted in “no” detections of VOCs or hydrocarbon contaminants. Thus, as stated in the A.L. Burke report of June 1990, “it appear[s] that the property of the Airport Authority is free from contaminations from the [former] gravel pit operations.” [CD, Doc. No. 17, ENSR 025391]. The Authority is unable to locate a copy of the Regional Board’s subsequent letter of November 1990, but believes that given the findings in the June 1990 A.L. Burke report no further investigation of the gravel pit, which is not even owned by the Airport Authority, would be merited or necessary.

15. A March 4, 1993 letter from the RWQCB to the BGPAA states that Phase I and Phase II environmental assessments had been completed for the property located at **7550 Wheatland Avenue** as part of the BGPAA’s extension project. These assessments reportedly confirmed soil contamination in this area. A 7/23/2001 RWQCB Site Inspection Report indicates that the BGPAA conducted an additional soil investigation in this area in 1994 during which shallow contaminated soils were removed.

a. State whether the BGPAA conducted operations in this area and, if so, provide the dates of operations and describe the types of operations conducted;

b. Provide copies of the Phase I and Phase II Environmental Assessment reports for 7550 Wheatland Avenue; and

c. Provide a copy of the 1994 soil investigation report for the 7550 Wheatland Avenue and any other reports that describe the soil sampling and remediation activities in this area.

BGPAA Response to Supplemental Question No. 15:

*(a) The Authority did not conduct operations at this location, commonly described as **7550 Wheatland**. The Authority, however, acquired this property through exercise of its eminent domain authority and conducted environmental due diligence on the property prior to the acquisition.*

(b) After diligence search of its files, the Authority has been unable to locate copies of the Phase I or Phase II assessment reports.

(c) The Authority is attaching a copy of Fugro West, Inc.'s October 24, 1994 report detailing further soil sampling and excavation results for this property, which was also termed the "Hensler Acquisition" project. As noted in the report and the attached laboratory reports, although petroleum products (not hazardous substances) were found in the soils, no detection of VOCs was found in the soils. Moreover, after excavation, a subsequent retest of the soils demonstrated much lower levels of residual hydrocarbons in the soils. [CD, Doc. No. 25].

16. A June 7, 1996 letter from the RWQCB to the BGPAA references an April 1996 environmental audit report submitted by the BGPAA that documented past and present operations in the **former Plant B-5 area** during the period of the BGPAA's ownership of this property since 1978. The letter states that

the BGPAA's audit report identified areas of environmental concern within the former Plant B-5 property.

- a. Provide a copy of the April 1996 environmental audit report for the former Plant B-5 property submitted by the BGPAA; and
- b. As indicated by the June 7, 1996 letter, also provide a copy of the Oct. 1995 Hertz Corporation Baseline Environmental Assessment report prepared by Ninyo & Moore, which was apparently referenced in the BGPAA's April 1996 environmental audit report.

BGPAA Response to Supplemental Question No. 16:

(a) The Airport Authority is attaching its best current (and partial) copy of the April 1996 Environmental Audit prepared by Fugro West, Inc. [CD, Doc. No. 18]. The Authority will attempt to locate a complete copy of this audit and, if it locates such a copy will provide it to EPA.

(b) The Authority will provide to EPA a copy of the referenced Ninyo & Moore report from October 1995. [CD, Doc. No. 27].

17. A letter from Lockheed Martin to the RWQCB dated January 28, 1998 states that a central clarifier located inside **Hanger 6 at the former Plant B-5** has been the responsibility of the BGPAA since 1978. With regard to this central clarifier, as well as the second clarifier located near the southwestern corner of Hanger 6 and the parts washer in this area, please identify:

- a. The dates the two clarifiers and parts washer were in operation.
- b. The name/s of all parties who used these clarifiers and parts washer in their operations (specifically stating whether the BGPAA itself operated these structures);
- c. The nature of the operations in which the clarifiers and parts washer were involved; and
- d. Whether the clarifiers and parts washer have been removed and/or relocated.

BGPAA Response to Supplemental Question No. 17:

(a)-(c): The Airport Authority is unable to currently confirm the exact operations of all tenants who might have utilized either of the two “clarifiers” or the parts washer. The Airport Authority notes that according to a Regional Water Quality Control Board letter dated August 29, 1997 [CD, Doc. No. 20], the “parts washer” inside Hangar 6 was then described by the Regional Board as being used by “Earth Star”, the name of the private jet entity owned and operated by Walt Disney Corporation. The Authority has previously identified Earth Star, Inc. /Walt Disney in its February 29, 2008 responses to EPA as a tenant on the property with a current street address of 3000 Clybourne Avenue. Based upon its review, the Authority believes that Earth Star Inc. operated in or adjacent to the former Hangar 6 during at least part of the 1990s, before relocating to a different location (the 3000 Clybourne Avenue site) north of the east/west runway. The Authority leased property including Hangar 6 as well as other adjacent Hangars (7, 7A, and 7B) to Mercury Air Group, Inc. The Authority did not directly deal with

subtenants of Mercury Air, such as EarthStar, and therefore lacks more detailed records about what such subtenants did or how they may have utilized the parts washer or either clarifier.

(d) The Airport Authority understands that the two clarifiers and the parts washer were the subject of further investigations conducted directly by Lockheed Martin Corporation pursuant to a directive issued by the Regional Water Quality Control Board dated August 29, 1997, and possibly subsequent follow-up directives by the Regional Board. In its August 29, 1997 letter, the Regional Board directed that the soil boring adjacent to the "clarifier" located outside of Hangar 6 in the "southeast corner" could be eliminated since a site investigation determined that this location was in fact merely a "utility pit." [CD, Doc. No. 20]. The Airport Authority believes that the former clarifiers and parts wash no longer exist on or adjacent to Hangar 6 based upon the extensive redevelopment of this area by the current tenant, Federal Express. But, the Authority does not know exactly when the removal occurred.

18. EPA obtained a copy of an April 1995 Subsurface Assessment Workplan prepared for the BGPAA for the property leased to Media Aviation in the area of the flammable liquid storage shed located southeast of **Hanger 5 at former Plant B-5** (identified in the workplan as Leasehold 8K). Provide a copy of the subsurface investigation report evidencing the results of the soil vapor sampling conducted pursuant to this 1995 Workplan.

BGPAA Response to Supplemental Question No. 18:

The Authority has been unable to locate a copy of any soil vapor sampling work conducted pursuant to the April 7, 1995

*Fugro West, Inc. proposal. The Authority, however, notes that Fugro's successor in interest, ENSR, conducted a Phase I ESA for the former Media Aviation properties, including the former **Building 5 at the former Plant B-5** in 2002. As ENSR noted in its final report dated July 2002, the purpose of the Phase I was to "determine whether Media or subtenant activities on the subject property have resulted in a hazardous material or petroleum hydrocarbon release or impact. . ." ENSR's Phase I review concluded that "no evidence of a significant, large-scale release or oil and chemicals was observed on the subject property. . ." [CD, Doc. No. 28, ENSR 2700].*

19. A May 15, 1991 Preliminary Environmental Site Assessment for the property at 3000 N. Clybourn Avenue leased by the BGPAA to Martin Aviation (covering four leasehold areas identified in this report as 4B, 4C, 4D and 8K) makes references to a November 1989 Leak Detection Investigation conducted in the Leasehold 4C area by Applied Environmental Consulting, Inc. During the 1989 investigation, soil was sampled near the industrial waste clarifier and underground storage tank located east of **Building 31**. Provide a copy of the 1989 Leak Detection Investigation report.

BGPAA Response to Supplemental Question No. 19:

The Authority has been unable to locate a copy of the Leak Detection Report, and further notes that the May 1991 Preliminary Environmental Site Assessment Report was prepared by a consultant to Media Aviation, not to the Airport Authority.

*The Authority further notes that in April 1995 and again in August 1995 it submitted two separate reports concerning areas of the former Media Aviation property, including **Building 31**. Based upon the two reports, the Regional Water Quality*

Control Board issued two “no further action” letters to the Airport Authority concluding that: “no further investigation or remediation is required.” [CD, Doc. Nos. 29 and 30].

20. In the November 1, 1988 104(e) response submitted to the EPA on behalf of the BGPAA by its consultant, A. L. Burke Engineers, Inc., a list of attachments was provided. However, copies of two of the listed reports were not attached. Please provide copies of the following:

- a. Soils Report by LeRoy Crandall Associates; and
- b. Project Report, Investigation of Hazel Martin Property, 10/12/87.

BGPAA Response to Supplemental Question No. 20:

(a) The Authority has been unable to locate a copy of any “soils report by LeRoy Crandall Associates” in its files. The Authority’s consultant, A.L. Burke, performed additional soil borings and soil vapor studies in the 1989–1991 time period and that those studies resulted in findings of “no further action” by the Regional Water Board. It is the subsequent work by A.L. Burke that is relevant in evaluating this former site.

(b) The Authority is attaching a copy of the October 12, 1987 report related to the “Hazel Martin” property as CD, Doc. No. 31.

Separate EPA Request for Supplement Information in
Response to Review of February 29, 2008 BGPAA
Information Responses:

17.b. With regard to the Plant B-5 property(refer to attached map) all soil and soil gas data obtained by or conducted at BGPAA's request prior to 1998 and after 2000; all groundwater monitoring data since December 2006; and groundwater data for all available years from wells 3830K and 3840F.

EPA Supplemental Request: Please respond to this question in relation to the former Plant B-5 area by providing a complete list of all sampling conducted in this area by, or on behalf of, the BGPAA since it acquired ownership of this property in 1978.

BGPAA Response to Supplemental Information Request
Related to 2007 Information Request No. 17.b.:

The Airport Authority is aware of a Regional Water Board request made in October 1995 for an "environmental audit" of the former Lockheed Plant B-5 property. The Regional Water Board granted the Authority two extensions of time to respond to that request, and in April 1996, the Authority responded through its then consultant, Fugro-West, in an "Environmental Audit" dated April 1996. [CD, Doc. Nos. 32-34]. As previously noted, however, the Authority has to date only been able to locate a partial copy of the Fugro April 1996 Environmental Audit for the B-5 property, a copy of which

is attached as CD, Doc. No. 18. The Authority is still searching its files in an effort to locate a complete copy of that environmental audit and will submit a complete copy if the Authority locates that document.

The Regional Board files, particularly a Board letter dated June 7, 1996, indicates that the Regional Board required further subsurface investigations of portions of the former B-5 plant after review of the April 1996 environmental audit reports. [CD, Doc. No. 35]. The Authority's review indicates that thereafter Lockheed Martin Corporation, through its consultant, conducted a variety of subsurface soil and soil vapor investigations at the former B-5 property. At least part of this B-5 investigation was done cooperatively with the Airport Authority since the investigation covered both pre-closure (pre March 30, 1978) areas and areas that the Regional Board deemed to require investigation based upon activities that took place after the Airport Authority acquired the B-5 property in March 1978.

Thus, the Airport Authority further identifies documents prepared by Tetra Tech, Inc. on behalf of Lockheed Martin for further work and investigation of the B-5 plant, including but not limited to the following documents:

April 18, 1996, Tetra Tech, **Final Phase I Environmental Assessment Former Plant B-5, Burbank, California;*

November 30, 2001, Tetra Tech, **Soil Vapor and Soil Matrix Sampling Work Plan, Former Plant B-5;*

December 6, 2001, Tetra Tech, **Addendum Pages to Soil Vapor and Soil Matrix Sampling Work Plan, Former Plant B-5; and*

**February 6, 2003, Tetra Tech, Supplemental Soil Vapor, Soil Matrix, and Groundwater Investigation Report, Lockheed Former Plant B-5 Facility.*

Although each of these reports were prepared primarily for Lockheed Martin Corporation, it is the Airport Authority's understanding that at least the last three reports from the 2001-2003 time period were partially funded by the Authority, and therefore constitute documents "prepared by or on behalf of BGPAA" as well as for Lockheed. The Authority notes that the Regional Water Quality Control Board reviewed, referenced, and accepted the cited Tetra-Tech reports in reaching its "no further action" as to soils beneath the former Lockheed B-5 plant dated June 29, 2004. (CD, Doc. No. 36). The sampling work undertaken by Tetra-Tech clearly would have discovered post-1978 contamination (if any existed) in the soils that a tenant of the Airport might have released since the Tetra-Tech sampling work was done in the 2002-2003 time period.

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